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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

MM Docket No. 96-10
RM-8738

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Farmersville and Greenville,)
Texas))

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TO: Chief, Allocations Branch
Mass Media Bureau

REPLY COMMENTS

Greenville Broadcasting ("GB"), by its attorneys, hereby submits comments in further support of its Counterproposal, filed with the Commission on April 5, 1996, in the above-captioned proceeding in response to the proposal of Galen O. Gilbert ("Gilbert") to allot Channel 260C3 at Farmersville, Texas. See Notice of Proposed Rulemaking, DA 96-104, released February 13, 1996. GB counterproposed that the Commission allot Channel 260C3 at Greenville, Texas instead of allotting Channel 260C3 at Farmersville. GB further supports its request to allot Channel 260C3 at Greenville by stating the following.¹

¹ Additional counterproposals were filed by Thomas S. Desmond (proposing to allot Channel 260A at Blue Ridge, Texas), and by Hunt Broadcasting, Inc. and Cowboy Broadcasting, L.L.C. (who jointly proposed some ten new and modified allotments, including the substitution of Channel 260A for Channel 244A at Mineola, Texas). Because the Commission has not yet accepted these counterproposals, GB reserves the right to file further comments addressing those

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Greenville, Texas, is the county seat for Hunt County and had a 1990 census population of more than 23,000 people. Hunt County's 1990 census population was 64,343, thus Greenville accounts for approximately 36% of the county's total population. Greenville is more than 8.7 times the size of Farmersville, whose total population accounts for less than 1% of its county's population.² Greenville is an industry-oriented city and home to several Fortune 500 and other companies, which bring business, commercial activity and revenue to the area and employ thousands of Greenville residents and non-residents. Greenville has approximately 1,200 businesses which employ more than 17,000 people, including more than 40 manufacturing firms which employ over nine thousand people. The city has a number of industrial development organizations which encourage and support business enterprises. Greenville is home to the Greenville Industrial Park, a 675-acre site, and there are plans for two additional industrial parks, including the Airport Industrial Park.³

Farmersville, on the other hand, is essentially a residential town with few major businesses or employers and more people who commute out of the town than into the town to work.⁴ The provision of a new radio voice would far better serve the needs of the

counterproposals if they are accepted.

² The 1990 U.S. census population for Farmersville, Texas, located in Collin County, was 2,640; Collin County had a population of 264,036.

³ Source: Greenville Chamber of Commerce.

⁴ Source: Farmersville Chamber of Commerce.

expanding business community of Greenville than Farmersville.

Greenville, as the county seat, is home to many services used regularly by county residents, including, among other things, Vehicle and Voter Registration services, Tax Assessment and Veteran services and Agricultural assistance. The city and its local businesses also provide many state services for Greenville and Hunt County residents including job training and placement under the Texas Employment Commission and Medicaid and low-income assistance under the office of Adult and Child Protective Services.

Greenville's provision of these city, county and state services, and its role as the economic and cultural hub of Hunt county, clearly demonstrate that Greenville has a greater need for a new local broadcast service than does Farmersville, a small town of no particular significance to Collin County. Although Farmersville may be considered to have a presumptive need for a first local service, which if considered in isolation might warrant the proposed allotment in the NPRM, that presumption is overcome by the considerably greater need that Greenville has for its first competitive broadcast service.⁵ See e.g., Beacon Broadcasting, 2 FCC Rcd 3469 (1987), aff'd sub nom New South Broadcasting Corp. v. FCC, 8789 F.2d 867 (D.C. Cir. 1989). Cf. Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations, (Fredericksburg, Helotes and Castroville, Texas), 10 FCC Rcd 6580 (1995).

⁵ As mentioned in GB's counterproposal, the only two radio stations licensed to Greenville, KGVL(AM) and KIKT(FM), are co-owned.


The allotment of Channel 260C3 at Greenville over Farmersville will not deprive Farmersville of the benefit of a new reception service. Because of the proximity of Farmersville to Greenville (about 14 miles) and the limited site area available for Channel 260C3, a new station at Greenville will provide service to Farmersville.⁶ While this may not be the equivalent of a local service authorized at Farmersville, the fact is that Farmersville lacks the economic and business base to support a Class C3 FM station, and because of the proximity and economic significance of Greenville, any such station would have to look to Greenville and its substantial economic base for financial survival. Under the circumstances, there is no reason to deprive Greenville in name of what will in fact be a Greenville station.

⁶ Depending on the specific transmitter site used, Farmersville would be within the city grade or 1 mV/m service

WHEREFORE, for the foregoing reasons, Greenville Broadcasting respectfully requests the Commission to allot Channel 260C3 at Greenville, Texas, as that community's second FM allotment.

Respectfully Submitted,

GREENVILLE BROADCASTING

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DATED: April 22, 1996

CERTIFICATE OF SERVICE

I, Mark Van Bergh, do hereby certify that true copies of the foregoing were sent April 22, 1996, by first-class United States mail, postage prepaid, or as indicated by hand to the following:


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